

I respectfully request the Commission to consider the burden recording and retention of programming would place upon our small company. We own four small market stations in Culpeper, Orange, and Louisa Virginia. We no longer have the capacity to record audio in analog (tape) format. In order to accomplish what the Commission is proposing we would have to make considerable capital investment. Most importantly, this investment would not be used to further the public interest by helping us improve programming or information delivery; rather we might have to consider which local programming expense must be cut in order to pay for this mandate. We would also have to budget for extra payroll in order to accomplish the task. Whom on our current staff would the Commission suggest be replaced? Our News Director? Our Morning Show host? Our Public Service director?

Another argument against this new requirement is that we would be asked to create a whole new, burdensome layer of recordkeeping when our company already has safeguards in place to avoid obscenity on-air. Our policies are clear, and we have never had a complaint filed about our stations. In the absence of any complaint history, why does it make sense for our company to be unfairly burdened with this new record keeping requirement. The Commission already has rules in place concerning indecency and obscenity. Those rules, properly enforced, should protect the public interest. Forcing those not guilty of violations to 'pay for the sins' of a few seems to us very unfair.

Thank you for your consideration.

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